

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

CONFIDENTIAL

RICHARD WALKER,

Plaintiff,

v.

CIVIL ACTION NO. 3:20-cv-773

ALLIANCE OUTDOOR GROUP, INC.,
and
ALLIANCE OUTDOORS PRODUCTS, INC.,
d/b/a X-STAND TREESTANDS,

Defendants.

AUDIO-VISUAL VIDEOTAPED
DEPOSITION UPON ORAL EXAMINATION
OF NATHAN M. STIEREN,
TAKEN ON BEHALF OF THE PLAINTIFF

Unionville, Missouri

August 31, 2021

EXHIBIT

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KATHLEEN BEARD ADAMS, CCR, RPR, CRR

Court Reporter

<p style="text-align: right;">Page 13</p> <p>1 case, which was 2015?</p> <p>2 A. I wouldn't know.</p> <p>3 Q. Okay. Do you know who designed the 2015</p> <p>4 -- the -- the -- the product at issue in this case,</p> <p>5 the 2015 treestand?</p> <p>6 A. I don't remember.</p> <p>7 Q. Okay. Do you know how Alliance would</p> <p>8 choose a -- a manufacturer for -- for its products?</p> <p>9 A. No. I'm not really involved in the</p> <p>10 day-to-day operations. I -- I've got good -- I have</p> <p>11 good team members and I rely on them.</p> <p>12 Q. I understand. I -- I understand. Who</p> <p>13 -- who was the individual involved with making a</p> <p>14 decision as to where to manufacture of the product</p> <p>15 would -- would take place and with -- with what --</p> <p>16 what entity?</p> <p>17 A. You know, to be sure I'd have to ask Bob</p> <p>18 Meyer. He would know the answer to that.</p> <p>19 Q. Okay. Okay. Do you know why the tree</p> <p>20 -- treestand drawings from 2017 were produced but</p> <p>21 not any from 2015 or earlier?</p> <p>22 A. I don't know.</p> <p>23 Q. Okay. Do you know if there were any</p> <p>24 earlier design drawings prior to the 2017 version?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 15</p> <p>1 A. I don't know.</p> <p>2 Q. Okay. Do you know what the</p> <p>3 specifications of the cable design were?</p> <p>4 A. I don't know.</p> <p>5 Q. Okay. Do you know where the actual</p> <p>6 cable that was at issue in this case was</p> <p>7 manufactured?</p> <p>8 A. I don't know.</p> <p>9 Q. Okay. So, just to be clear, you -- I</p> <p>10 understand you don't know. You -- you -- you're not</p> <p>11 in a position to be able to tell me the name of the</p> <p>12 company that manufactured the cable; is that right?</p> <p>13 A. That's correct. Like I said, you know,</p> <p>14 I -- I'm not involved in the day-to-day operations</p> <p>15 and I've got good people that I rely on for those</p> <p>16 decisions.</p> <p>17 Q. Sure. How many businesses are you --</p> <p>18 are you the president of?</p> <p>19 A. Well, that's a confusing question</p> <p>20 because we have a -- entities that also own like the</p> <p>21 building we're in, and so there's nonoperating and</p> <p>22 operating entities. So if I had to provide a graph,</p> <p>23 it would probably make more sense. But the</p> <p>24 operating entities -- I believe there's four of</p> <p>25 them.</p>
<p style="text-align: right;">Page 14</p> <p>1 Q. Okay. Do you know if there were any</p> <p>2 design modifications since the X-Stand model was</p> <p>3 first manufactured?</p> <p>4 A. I don't know. I know Barry mentioned</p> <p>5 that --</p> <p>6 MR. SUTTON: Hold on. No. No.</p> <p>7 MR. SPINELLI: Okay.</p> <p>8 MR. SUTTON: You don't want to ask --</p> <p>9 anything we just talked about, that's -- that's</p> <p>10 attorney-client privilege, so --</p> <p>11 THE DEPONENT: Okay.</p> <p>12 BY MR. SPINELLI:</p> <p>13 Q. It -- it may not all be, but I don't</p> <p>14 want to go down that road, so if Barry told you I --</p> <p>15 I don't want to touch on that.</p> <p>16 A. Okay.</p> <p>17 Q. Do you need -- do you need me to restate</p> <p>18 the question?</p> <p>19 A. Yes. That would be great.</p> <p>20 Q. Okay. Do you know if there have been</p> <p>21 any design modifications since the X-Stand model was</p> <p>22 first manufactured?</p> <p>23 A. No.</p> <p>24 Q. Okay. Do you know who decided to use</p> <p>25 the cable design in this particular product?</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Okay. So -- and that's the two Alliance</p> <p>2 entities and then two others. Have I got that</p> <p>3 right?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. What are the two other entities?</p> <p>6 You may have told me already and I've glossed over</p> <p>7 it, but what are those?</p> <p>8 A. A protein shake businesses for kids'</p> <p>9 health, protein shakes and immune support. And the</p> <p>10 other one is electric bikes.</p> <p>11 Q. Electric bikes. Okay.</p> <p>12 How long has the electric bikes business</p> <p>13 been -- been around?</p> <p>14 A. You know, I -- again we're talking about</p> <p>15 years ago. I believe that it was probably formed in</p> <p>16 2014, maybe 2015.</p> <p>17 Q. How about the protein shakes business?</p> <p>18 A. It was after that, but I don't know what</p> <p>19 year. Maybe 2018, '19.</p> <p>20 Q. Okay. So you -- you -- you're not sure</p> <p>21 of the name of the company that manufactured the</p> <p>22 cable; is that correct? And I apologize if I</p> <p>23 already asked that, but it that right?</p> <p>24 A. That's correct.</p> <p>25 Q. Okay. So you're not in a position to</p>